

**STANDING COMMITTEE ON
AGRICULTURE AND AGRI-FOOD**



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

**COMITÉ PERMANENT DE
L'AGRICULTURE ET DE
L'AGROALIMENTAIRE**

Ottawa, March 23, 2017

The Honourable Jane Philpott
Minister of Health

Dear minister,

Following your decision to grant a thirty-day extension to the consultation process on Health Canada's Pest Management Regulatory Agency (PMRA) proposed re-evaluation decision PRVD2016-20 concerning the neonicotinoid pesticide imidacloprid, the Standing Committee on Agriculture and Agri-Food held two public hearings on 7 and 9 March 2017 on the PMRA's proposed decision.

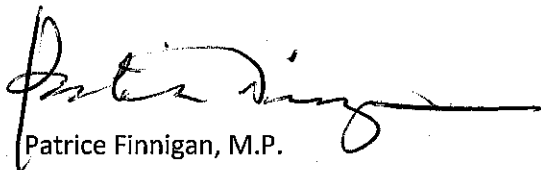
During the meetings we heard from a wide range of perspectives, and concerns have been raised about the lack of transparency of PMRA's re-evaluation process. More specifically, dialogue with the registrant was not pursued once potential risks had been identified. Witnesses suggested that dialogue with the registrant and other stakeholders should be initiated earlier in the process, before a decision is published, to allow for scientific input and new data to be obtained. In addition, witnesses felt that the current ninety-day comment period is not enough for the multi-stakeholder forum working groups to gather information and fulfill their mandate effectively.

Pesticide manufacturers also suggested that PMRA consider additional recent studies in its decision, since it dismissed many studies showing that there were no imidacloprid concentrations of concern in water samples collected across Canada. In their view, the decision does not take into account the regional differences or the different production practices. They also criticized the fact that the toxicity threshold was determined based only on laboratory data rather than on mesocosm studies, which they believe are more revealing of the real environmental impact.

Finally, although there are imidacloprid alternatives, they may not be economically sustainable and profitable solutions for farmers. Some in the beekeeping industry, for example, fear that alternative products could turn out to be more harmful to bees than neonicotinoids. Farmers and pesticide registrants are afraid that discontinuing imidacloprid would force farmers to use greater quantities of ineffective pesticides, resulting in even greater environmental damage and possible harm to the applicator. It is in fact a concern that the environmental and health effects of a greater use of alternative products have not been weighed in the re-evaluation of imidacloprid.

The loss of the pesticide imidacloprid remains a great concern for the agriculture sector, and the Committee hopes that you will take our concerns into account in your decision concerning the re-evaluation of imidacloprid.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrice Finnigan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrice Finnigan, M.P.

Chair of the Standing Committee on Agriculture and Agri-Food

c.c.: The Honorable Lawrence MacAulay, P.C. M.P.
Minister of Agriculture and Agri-Food